



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

1650 Arch Street

Philadelphia, Pennsylvania 19103-2029

June 2, 2016

Mr. Charles Barksdale
Site Environmental Director
Philadelphia Energy Solutions Refining
3144 Passyunk Avenue
Philadelphia, Pennsylvania 19145

Re: Request for Information

Dear Mr. Barksdale:

This letter is to follow up my June 2, 2016 telephone message you. At this time, EPA Region III is requesting information from you regarding your company's facility, located at 3144 Passyunk Avenue in Philadelphia, PA (referred to hereinafter as "the Facility"), to determine the status of the Facility's compliance with Section 313 of the Emergency Planning and Chemical Reporting Act (EPCRA), 42 U.S.C. 42 U.S.C. § 11023, and the regulations implementing Section 313 which are codified at 40 C.F.R. Part 372, Subpart B Reporting Requirements.

Specifically, you are requested to submit via mail or pdf, the following information:

1. The Facility's primary SIC and NAICS code;
2. The company's total corporate revenue during calendar year 2015 (if the revenue for 2015 is not available at this time, supply the total corporate revenue for 2014);
3. The number of people employed at the Facility during calendar years 2012, 2013, and 2014;
4. The amounts of manufactured, processed, or used during calendar years 2012, 2013, and 2014;
5. The amount (in pounds) of antimony compounds, lead compounds, cobalt compounds, hydrogen sulfide, nickel, and nickel compounds (each):
 - a. manufactured (via chemical reaction either directly or incidentally) during calendar years 2012, 2013, and 2014;
 - b. processed (e.g., implemented into the facility's products) during 2012, 2013, and 2014; and
 - c. otherwise-used (e.g., as a component of fuel burned or as a processing aid or for ancillary use such as cleaning process equipment) during calendar years 2012, 2013, and 2014.
6. Supplement your responses to question 5 with supporting calculations and other supporting information (e.g., inventory balances, Material Safety Data Sheets used in the calculations, etc).
7. A brief description of facility's background and operations;
8. A facility map and plot plan; and
9. A brief summary and flow diagrams of the facility's processes.

Please submit this information to me by June 24, 2016. My contact information is as follows:

Craig E. Yussen
Chemical Engineer
U.S. Environmental Protection Agency-Region III
Land & Chemicals Management Division
Toxics Programs Branch (3LC61)
1650 Arch Street
Philadelphia, PA 19103-2029

Phone: 215-814-2151
Fax: 215-814-3114
Email: yussen.craig@epa.gov

On the last page of the company's response, the following certification should be signed by an officer or other responsible corporate official (e.g., president, secretary, treasurer, or vice president) in charge of a principal business function, or another executive with authority to perform similar policy or decision-making functions for the Facility when it was in operation:

"I certify that I am fully authorized by Philadelphia Energy Solutions Refining to provide the above information on its behalf to the U.S. Environmental Protection Agency (EPA) in response to EPA's letter dated June 2, 2016. I certify under penalty of law that this response and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

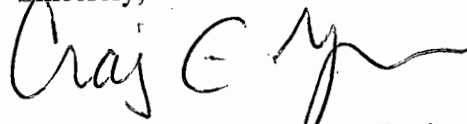
Signature _____
Name _____
Title _____

Philadelphia Energy Solutions is entitled to assert a claim of business confidentiality covering all or any part of the information it submits, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business confidentiality is not asserted at the time the required information is submitted to EPA, EPA may make this information available to the public without further notice to you.

This request for submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section, 3501 *et seq.*

If you have any questions or concerns regarding this matter, you may contact me at 215-814-2151. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Craig E. Yussen". The signature is written in dark ink and is positioned above the printed name.

Craig E. Yussen, Chemical Engineer
Toxics Programs Branch

Yussen, Craig

From: Yussen, Craig
Sent: Thursday, June 02, 2016 4:30 PM
To: 'charles.barksdale@PES-companies.com'
Cc: Dangelo, AJ
Subject: Request for Information re: EPCRA Section 313
Attachments: Philadelphia Energy Solutions request for info.pdf

Mr. Barksdale-

This email is a follow up to our June 2, 2016 telephone conversation regarding the above-referenced matter. Please see the attached pdf version of the letter requesting information. Please submit your reply, via pdf or mail by June 24, 2016. I will mail you a hard copy of the letter as well. If you have any questions or concerns, please contact me at the number below. Thank you.

Craig E. Yussen, Chemical Engineer
U.S. EPA Region III
Land and Chemicals Division (3LC61)
1650 Arch St.
Philadelphia, PA 19103-2029

phone: 215-814-2151
fax: 215-814-3114
email: yussen.craig@epa.gov

Note: This email is intended for only the above recipient(s) and may contain privileged information. If you have received this message in error, please contact me at the number above, or send me a reply email, and remove all copies of this email from your system. Thank you for your cooperation.

Yussen, Craig

From: BARKSDALE JR, CHARLES D <CHARLES.BARKSDALE@pes-companies.com>
Sent: Wednesday, June 22, 2016 4:51 PM
To: Yussen, Craig
Cc: FORD, JESSICA N
Subject: RE: Request for Information re: EPCRA Section 313 - CONFIDENTIAL BUSINESS INFORMATION
Attachments: EPA TRI Request June 2016.pdf

Mr. Yussen,

Thanks for this extension. I've attached what I have compiled so far for your initial review. I have some additional backup information and the certification that will be provided next week. In the meantime, if you have questions on what I've provided, let me know and I'll supplement or revise it next week.

Also, this should be considered Confidential Business Information. In the formal submittal next week, I'll mark more clearly the sections that are CBI which is primarily the supporting information.

Thanks,
Chuck

Chuck Barksdale
Site Environmental Director
Philadelphia Energy Solutions Refining and Marketing LLC
215-339-2074 (office)
610-299-6260 (cell)
866-302-2146 (fax)

From: Yussen, Craig [mailto:Yussen.Craig@epa.gov]
Sent: Wednesday, June 22, 2016 2:27 PM
To: BARKSDALE JR, CHARLES D
Subject: Re: Request for Information re: EPCRA Section 313

Mr. Barksdale -

This email is to follow up my 6/22/16 voice message to you. In response to my June 2, 2016 letter, please send me what you have by June 24, 2016 and provide everything else (e.g., certifications, etc.) by July 1, 2016. Let me know if you have any questions or concerns. Thanks.

Craig E. Yussen, Chemical Engineer
U.S. EPA Region III
Land and Chemicals Division (3LC61)
1650 Arch St.
Philadelphia, PA 19103-2029

phone: 215-814-2151
fax: 215-814-3114

email: yussen.craig@epa.gov

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Philadelphia Energy Solutions → Candidate for desk audit

	2011	2012	2013	2014
Copper Compounds	No	No	No	No
Antimony Cpd.	Yes	Yes	Yes	No
Lead Cpd.	Yes	Yes	Yes	No
Cobalt Cpd.	Yes	No	Yes	Yes
Hydrogen Sulfide	No	Yes	Yes	Yes
Nickel	Yes	No	No	No
Nickel Compounds	No	No	No	No
Technical Contact	Charles Barksdale, Jr.	Charles Barksdale, Jr.	Charles Barksdale Jr.	Charles Barksdale Jr.

215-339-2074

610-295-6260

Charles.Barksdale@PES-Companies.com

Title: Site Environmental Director.

Phila Energy Solutions Refining Philadelphia Refinery
 3144 Passyunk Ave.
 Philadelphia, PA 19145

AJ's facility

Philadelphia Energy Solutions Refining + Marketing

Cu Cpds (2011-14) Reported?

2011 - No

2012 - No

2013 -

2014 -

b Cpds (2014) - 2011-7, 2012-7, 2013-
2014 -

b Cpds (2014) - 2011-7 2012-N 2013
2014 -

Co Cpds (2014) - 2011-7 2012 2013
2014 -

H₂S (2011) -
2011 - No, 2012, 2013 - 2014 -

N₂
2011-7 2012 2013 2014

Vi Cpds
2011 2012 2013 2014

Technmil Contact

011

2012

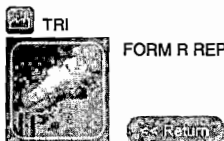
2013

2014



Envirofacts Form R

2014



FORM R REPORTS

Facility Name Containing: Philadelphia Energy Solutions
Reporting Year Selected: 2014
Search Executed On: MAY-31-2016
Results are based on data extracted on: MAR-09-2016

LIST OF DOCUMENT CONTROL NUMBERS WITH THEIR CHEMICAL NAMES IN ENVIROFACTS

- To obtain a Form R Detailed Report for all the Document Control Numbers listed in the table below Click here: [19145TLNTC3144P](#)
- Click on a selected Document Control Number from the table below to get the Form R Detailed Report.

DOCUMENT CONTROL NUMBER	CHEMICAL NAME	FORM TYPE INDICATOR
1314212916934	1,2,4-TRIMETHYLBENZENE	FORM R
1314212916961	AMMONIA	FORM R
1314212917001	BENZENE	FORM R
1314212917037	BENZO(G,H,I)PERYLENE	FORM R
1314212917049	COBALT COMPOUNDS	FORM R
1314212917052	CUMENE	FORM R
1314212917064	CYCLOHEXANE	FORM R
1314212917076	ETHYLBENZENE	FORM R
1314212917088	ETHYLENE	FORM R
1314212917090	ETHYLENE GLYCOL	FORM R
1314212917102	HYDROGEN CYANIDE	FORM R
1314212917114	HYDROGEN FLUORIDE	FORM R
1314212917126	HYDROGEN SULFIDE	FORM R
1314212917138	MERCURY COMPOUNDS	FORM R
1314212917153	METHANOL	FORM R
1314212917165	MOLYBDENUM TRIOXIDE	FORM R
1314212917177	N-HEXANE	FORM R
1314212917189	NAPHTHALENE	FORM R
1314212917191	PHENOL	FORM R
1314212917203	POLYCYCLIC AROMATIC COMPOUNDS	FORM R
1314212917215	PROPYLENE	FORM R
1314212917227	STYRENE	FORM R
1314212917239	SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)	FORM R
1314212917241	TETRACHLOROETHYLENE	FORM R
1314212917254	TOLUENE	FORM R
1314212917266	XYLENE (MIXED ISOMERS)	FORM R

Total Number Of DCN's Found: 26

**Envirofacts
Form R**

TRI



FORM R REPORTS



2013

Facility Name Containing: Philadelphia Energy Solutions

Reporting Year Selected: 2013

Search Executed On: MAY-31-2016

Results are based on data extracted on: MAR-09-2016

LIST OF DOCUMENT CONTROL NUMBERS WITH THEIR CHEMICAL NAMES IN ENVIROFACTS

- To obtain a Form R Detailed Report for all the Document Control Numbers listed in the table below Click here: [19145TLNTEC3144P](#)
- Click on a selected Document Control Number from the table below to get the Form R Detailed Report.

DOCUMENT CONTROL NUMBER	CHEMICAL NAME	FORM TYPE INDICATOR
1313211769171	1,2,4-TRIMETHYLBENZENE	FORM R
1313211769195	AMMONIA	FORM R
1313211769233	ANTIMONY COMPOUNDS	FORM R
1313211769260	BENZENE	FORM R
1313211769308	BENZO(G,H,I)PERYLENE	FORM R
1313211769322	COBALT COMPOUNDS	FORM R
1313211769359	CUMENE	FORM R
1313211769385	CYCLOHEXANE	FORM R
1313211769411	ETHYLBENZENE	FORM R
1313211769450	ETHYLENE	FORM R
1313211769474	ETHYLENE GLYCOL	FORM R
1313211769498	HYDROGEN CYANIDE	FORM R
1313211769512	HYDROGEN FLUORIDE	FORM R
1313211769548	HYDROGEN SULFIDE	FORM R
1313211769587	LEAD COMPOUNDS	FORM R
1313211769601	MERCURY COMPOUNDS	FORM R
1313211769625	METHANOL	FORM R
1313211769652	MOLYBDENUM TRIOXIDE	FORM R
1313211769688	N-HEXANE	FORM R
1313211769726	NAPHTHALENE	FORM R
1313211769738	PHENOL	FORM R
1313211769740	POLYCYCLIC AROMATIC COMPOUNDS	FORM R
1313211769753	PROPYLENE	FORM R
1313211769765	STYRENE	FORM R
1313211769777	SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)	FORM R
1313211769789	TETRACHLOROETHYLENE	FORM R
1313211769791	TOLUENE	FORM R
1313211769803	XYLENE (MIXED ISOMERS)	FORM R

**Envirofacts
Form R**



TRI



FORM R REPORTS



Facility Name Containing: Philadelphia Energy Solutions
Reporting Year Selected: 2012
Search Executed On: MAY-31-2016
Results are based on data extracted on: MAR-09-2016

2012

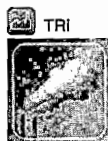
LIST OF DOCUMENT CONTROL NUMBERS WITH THEIR CHEMICAL NAMES IN ENVIROFACTS

- To obtain a Form R Detailed Report for all the Document Control Numbers listed in the table below Click here: [19145TLNLC3144P](#)
- Click on a selected Document Control Number from the table below to get the Form R Detailed Report.

DOCUMENT CONTROL NUMBER	CHEMICAL NAME	FORM TYPE INDICATOR
1312210711267	1,2,4-TRIMETHYLBENZENE	FORM R
1312210711279	AMMONIA	FORM R
1312210711281	ANTIMONY COMPOUNDS	FORM R
1312210711293	BENZENE	FORM R
1312210711305	BENZO(G,H,I)PERYLENE	FORM R
1312210711317	CUMENE	FORM R
1312210711331	CYCLOHEXANE	FORM R
1312210711368	ETHYLBENZENE	FORM R
1312210711382	ETHYLENE	FORM R
1312210711394	ETHYLENE GLYCOL	FORM R
1312210711406	HYDROGEN CYANIDE	FORM R
1312210711418	HYDROGEN FLUORIDE	FORM R
1312210711420	HYDROGEN SULFIDE	FORM R
1312210711432	LEAD COMPOUNDS	FORM R
1312210711444	MERCURY COMPOUNDS	FORM R
1312210711457	METHANOL	FORM R
1312210711469	MOLYBDENUM TRIOXIDE	FORM R
1312210711471	N-HEXANE	FORM R
1312210711483	NAPHTHALENE	FORM R
1312210711495	PHENOL	FORM R
1312210711507	POLYCYCLIC AROMATIC COMPOUNDS	FORM R
1312210711519	PROPYLENE	FORM R
1312210711521	STYRENE	FORM R
1312210711533	SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)	FORM R
1312210711545	TETRACHLOROETHYLENE	FORM R
1312210711558	TOLUENE	FORM R
1312210711560	XYLENE (MIXED ISOMERS)	FORM R

Total Number Of DCN's Found: 27

Envirofacts
Form R



FORM R REPORTS



Facility Name Containing: Philadelphia Energy Solutions
Reporting Year Selected: 2011
Search Executed On: MAY-31-2016
Results are based on data extracted on: MAR-09-2016

2011

LIST OF DOCUMENT CONTROL NUMBERS WITH THEIR CHEMICAL NAMES IN ENVIROFACTS

- To obtain a Form R Detailed Report for all the Document Control Numbers listed in the table below Click here: [19145TLNCTC3144P](#)
- Click on a selected Document Control Number from the table below to get the Form R Detailed Report.

DOCUMENT CONTROL NUMBER	CHEMICAL NAME	FORM TYPE INDICATOR
1311209708179	1,2,4-TRIMETHYLBENZENE	FORM R
1311209708181	AMMONIA	FORM R
1311209708193	ANTIMONY COMPOUNDS	FORM R
1311209708205	BENZENE	FORM R
1311209708217	BENZO(G,H,I)PERYLENE	FORM R
1311209708229	COBALT COMPOUNDS	FORM R
1311209708231	CUMENE	FORM R
1311209708243	CYCLOHEXANE	FORM R
1311209708256	ETHYLBENZENE	FORM R
1311209708268	ETHYLENE	FORM R
1311209708270	ETHYLENE GLYCOL	FORM R
1311209708282	HYDROGEN CYANIDE	FORM R
1311209708294	HYDROGEN FLUORIDE	FORM R
1311209708306	LEAD COMPOUNDS	FORM R
1311209708318	MERCURY COMPOUNDS	FORM R
1311209708332	METHANOL	FORM R
1311209708344	MOLYBDENUM TRIOXIDE	FORM R
1311209708357	N-HEXANE	FORM R
1311209708369	NAPHTHALENE	FORM R
1311209708371	NICKEL	FORM R
1311209708383	PHENOL	FORM R
1311209708395	POLYCYCLIC AROMATIC COMPOUNDS	FORM R
1311209708407	PROPYLENE	FORM R
1311209708419	STYRENE	FORM R
1311209708421	SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)	FORM R
1311209708433	TETRACHLOROETHYLENE	FORM R
1311209708445	TOLUENE	FORM R
1311209708458	XYLENE (MIXED ISOMERS)	FORM R